Exide's Draft Closure Implementation Plan (CIP)

Exide Technologies Advisory Group

September 21, 2017

Department of
Toxic Substances Control

Facility Closure Progress

DTSC is currently working on:

Approving the Closure Implementation Plan (CIP):

- Cal/OSHA reviewed HASP
- SCAQMD reviewed air monitoring protocols

Securing a 3rd Party Oversight Contractor

- Parsons

What's Next

Schedule:

- Stakeholder Kickoff Meeting Scheduled – September 27, 2017
  - DTSC
  - SCAQMD
  - City of Vernon
  - US EPA
  - ETAG Technical Advisor Dr. Wells
  - Exide
- Closure Activity – October, 2017
  - Mobilization/Ramp-up to begin
  - Initial work will begin inside containment buildings

Closure Implementation

Key Elements:

- Closure activities will be conducted within a dust-controlled enclosure
- Trucks carrying waste will have yellow flags and avoid residential areas
- Vehicle emission control equipment will meet Tier 4 diesel engine requirements for 100% of off-road vehicles; be subject to idling restrictions; use low sulfur diesel.
- Third-Party Quality Assurance Contractor (Parsons) will be on-site full time to document compliance with the Closure Plan and CIP

SCAQMD Regulations

- **Exide's Title V Permit (to comply with SCAQMD Rule 1420.1)**
  - Requires daily lead and arsenic fence line monitoring
  - Total dust threshold is 50 ug/m^3
  - Lead threshold is 0.100 ug/m^3 (30-day average)
  - Arsenic threshold is 10 ng/m^3 (24-hour average)
  - Lead and arsenic specific thresholds make this more protective than Rule 1466
- **Rule 1466 – Control of Particulate Dust from Contaminated Soils**
  - Total dust threshold is 25 ug/m^3, but no lead/arsenic-specific component
  - Specific to "earth moving activities" greater than 50 CYs
  - Soil removal is not anticipated during Phase 1 of Closure
  - Phase 2 soil removal will fully comply Rule 1466
- **Rule 403 - Fugitive Dust – requires dust minimizing BMPs**

Closure Implementation

Work Flow:

- Secure permits, mobilize, and set up temporary facilities
- Remove Hazardous Building Materials (asbestos, fluorescent tubes/bulbs, mercury switches, etc.)
- Decontaminate and dismantle Interim Status Units
- Deconstruct Buildings (within enclosure)
- Remove and Deconstruct Kettles (within enclosure)
- Conduct Soil Sampling at the facility property
- Develop Plan for Phase 2 – (soils and foundations, to dovetail with on-site corrective action)

Further Deconstruction Information

CIP Overview Webcast (From March 2017):

- Here: http://www.dtsc.ca.gov/HazardousWaste/Projects/ExideClosure.cfm

- Includes
  - HAKI System Overview
  - Description of deconstruction sequencing and anticipated equipment
  - Description of Kettle Removal by Gantry Cranes

Questions and Comments

- If you have additional questions please contact me or DTSC's Exide Closure and Corrective Action Project Managers:

Pete Ruttan, PG – Unit Chief

Peter.Ruttan@dtsc.ca.gov

916-255-3777

Matt Wetter, PE, QEP – Closure Project Manager

Matthew.Wetter@dtsc.ca.gov

916-255-6629

Joel Bauman, PG, PMP – Corrective Action Project Manager

Joel.Bauman@dtsc.ca.gov

916-255-3630